

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

UNITED STATES OF AMERICA	:	
	:	
v.	:	CRIMINAL NO. 18-101
	:	
MITCHELL WHITE	:	

**DEFENDANT’S RESPONSE TO DEFENDANT AVROM BROWN’S
MOTION TO CONTINUE (Dkt. 332)**

Defendant, Mitchell White, by and through undersigned counsel, respectfully responds to the Motion of Defendant Avrom Brown to continue the trial until fall of 2022 or, in the alternative, to sever. Defendant White, by counsel, states as follows:

1. Defendant White has been under indictment in this case for almost three years, since January 9, 2019 (*see* Dkt.14).
2. Due to the complex nature of the case, trial was originally scheduled for April 6, 2020 (*see* Dkt. 134).
3. Due to the COVID pandemic and the resulting suspension of jury trials in the Eastern District of Pennsylvania and – most recently – due to the unavailability of a co-defendant’s counsel, the trial date has been repeatedly continued. Trial is now scheduled for January 10, 2021 (*see* Dkt. 308).
4. Being under the shadow of indictment for so long has negatively impacted Mr. White both personally and professionally, and he wishes the opportunity to clear his name.
5. Mr. White has Constitutional and statutory rights to a speedy trial. U.S. Const. amend. VI; 18 U.S.C. §3161.

For these reasons, Mr. White opposes continuance of the trial date, other than the two-day continuance separately requested by letter to the Court dated December 15, 2021 to accommodate defendant's necessary medical procedure.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Ann C. Flannery". The signature is fluid and cursive, with a large loop at the end.

ANN C. FLANNERY
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Attorney for Mitchell White


Date: December 21, 2021

CERTIFICATE OF SERVICE

I, Ann C. Flannery, counsel for defendant Mitchell White, hereby certify that on this 21st day of December 2021, I caused a true and correct copy of the foregoing Response to Motion to Continue to be served by ECF upon all counsel of record, including the following:

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A handwritten signature in black ink, reading "Ann C. Flannery". The signature is written in a cursive style with a large, looping "y" at the end. Below the signature is a horizontal line.

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